

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff,*

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED



**DECLARATION OF RUDOLPH FINK IV**

I, Rudolph Fink IV, state as follows in support of Plaintiff TQ Delta, LLC's Partially Opposed Motions *in Limine*:

1. I am a partner at The Davis Firm, P.C. and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit 01 is a true and correct copy of TQD\_TX00067742 produced in this case.
3. Exhibit 02 is a true and correct copy of excerpts of the August 4, 20022 deposition of Ms. Ahba Divine.
4. Exhibit 03 is a true and correct copy of excerpts of the August 12, 2022 deposition of Mr. Mark Roche.
5. Exhibit 04 is a true and correct copy of excerpts of the September 12, 2018 deposition of Mr. Mark Roche.
6. Exhibit 05 is a true and correct copy of TQD\_TX00472068 produced in this case.
7. Exhibit 06 is a true and correct copy of TQD\_TX00472096 produced in this case.
8. Exhibit 07 is a true and correct copy of excerpts of the January 13, 2020 trial transcript from *TQ Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-1835-RGA (D. Del. filed Nov. 4, 2013).
9. Exhibit 08 is a true and correct copy of excerpts of the May 22, 2019 trial transcript from *TQ Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-1835-RGA (D. Del. filed Nov. 4, 2013).

10. Exhibit 09 is a true and correct copy of excerpts from CommScope's Sixth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories (Nos. 1-18) served on November 14, 2022, in this case.
11. Exhibit 10 is a true and correct copy of excerpts of the Court's June 1, 2022 Markman Hearing in this case.
12. Exhibit 11 is a true and correct copy of excerpts of the Responsive Expert Report of Dr. Leonard J. Cimini, Jr. On The Noninfringement of The Family 1 And 4 Patents served in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of February, 2022, in Dallas, Texas.

**/s/ Rudolph Fink IV**  
Rudolph Fink IV